

## **REMARKS**

The present Amendment amends claims 1, 9 and 15 and leaves claims 2-8, 10-14 and 16-19 unchanged. Therefore, the present application has pending claims 1-19.

Claims 1-19 stand rejected under 35 USC §103(a) as being unpatentable over Martin (U.S. Patent No. 5,504,873) in view of Akizawa (U.S. Patent No. 5,548,724). This rejection is traversed for the following reasons. Applicants submit that the features of the present invention as now more clearly recited in claims 1-18 are not taught or suggested by Martin or Akizawa whether taken individually or in combination with each other as suggested by the Examiner. Therefore, Applicants respectfully request the Examiner to reconsider and withdraw this rejection.

Amendments were made to independent claims 1 and 15, from which the remaining claims depend, so as to more clearly recite that the present invention provides a storage device system and a method of activating a storage device system, wherein the storage device system includes a plurality of storage devices in which information is stored, a storage device control section for controlling storage of information in the storage devices, a connection unit connected to the storage device control section and first and second processors.

According to the present invention the first processor is connected to a local area network (LAN) external to the storage device system and converts data of a file access form received over the LAN into data of a block access form.

Further, according to the present invention the second processor is connected to the storage device control section via the connection unit and accesses the storage devices via the connection unit and the storage device control section in response to data of the block access form issued from the first processor.

Particularly, according to the present invention as now more clearly recited in the claims the second processor controls activation of the first processor including resetting the first processor by the second processor, re-supplying power to the first processor and activating a Basic Input/Output System (BIOS) of the first processor.

The above described features of the present invention now more clearly recited in the claims are illustrated, for example, in Fig. 17 and described in the corresponding portions of the specification.

The above described features of the present invention now more clearly recited in the claims are not taught or suggested by any of the references of record whether taken individually or in combination with each other. Particularly, the above described features of the present invention as now more clearly recited in the claims are not taught or suggested by Martin or Akizawa whether taken individually or in combination with each other as suggested by the Examiner.

In the Office Action the Examiner alleges that Applicants attempted to show non-obviousness by attacking the cited references individually. Such was not the case and the Examiner is encouraged to re-read the Remarks of the June 27, 2006 Amendment. In the Remarks, Applicants showed how both Martin and Akizawa are deficient of the same features recited in the claims.

Applicants then pointed out that since both Martin and Akizawa “suffer from the same deficiencies relative to the features of the present invention as now more clearly recited in the claims”, the “combination of Martin and Akizawa does not ... render obvious the features of the present invention as now more clearly recited in the claims”. The Examiner’s attention is directed to page 12, line 14 through page 13, the last line of the Remarks of the June 27, 2006 Amendment.

Thus, Applicants simply treated each reference individually so as to show that both are deficient of the same features recited in the claims. However, Applicants clearly argued that when Martin and Akizawa are combined in the manner suggested by the Examiner in the Office Action, the combination would still be deficient of the same features relative to the features of the present invention recited in the claims. Therefore, Applicants further clearly argued that since the combination is deficient of the same features of the present invention as recited in the claims, then the combination does not render obvious the features of the present invention as recited in the claims under 35 USC §103(a) as alleged by the Examiner. This is clearly an argument against the combination and as such should have been considered as such by the Examiner.

Accordingly, it would appear that the Examiner did not address Applicants arguments that the combination of Martin and Akizawa does not render obvious the features of the present invention as recited in the claims since the Examiner did not recognized that an argument against the combination was made by Applicants.

In any event, amendments were made to the claims as described above so as to more clearly describe features of the present invention not taught or suggested by Martin and Akizawa individually and in combination.

In the Office Action, it appears that the Examiner alleges that Martin discloses enabling the control system 40 to allocate storage resources and releases the allocations and noticing the control system 40 when the IFS, which is one of the resources, performs a read/write process. Attention is directed to col. 4, lines 48-59 of Martin. However, it is quite clear that Martin does not teach or suggest any of the above described features of the present invention now more clearly recited in the claims.

Particularly, at no point is there any teaching or suggestion in Martin that the second processor controls activation of the first processor including resetting the first processor by the second processor, re-supplying power to the first processor and activating a Basic Input/Output System (BIOS) of the first processor as recited in the claims.

One basic factor the Examiner has failed to address is how the control processors 114 and 116 as taught by Martin are equivalent to the first and second processors as recited in the claims. The claims clearly recite that the first processor receives data of a file access form from the host computer and converts the data of the file access form to data of a block access form and the second processor receives the data of the block access form and transfers the data to the disk drive. Those of ordinary skill in the art clearly understand that a file access or file access type data is quite different from a block access or block access type data. Thus, the first processor performs

functions in the handling of data differently than the second processor according to the present invention.

There is no similar teaching in Martin. In Martin, the control processors 114 and 116 merely perform the control of allocations of resources as described in col. 4, lines 48-59. There is absolutely no teaching or suggestion in Martin that one of the control processors 114 performs processing according to file access type data and that the other of the control processors perform functions according to block access type data as in the present invention.

Thus, Martin fails to teach or suggest a first processor that converts data of a file access form received over the LAN into data of a block access form and a second processor that accesses the storage devices in response to data of the block access form issued from the first processor as recited in the claims.

The above described deficiencies of Martin are not supplied by Akizawa. Akizawa is merely relied upon by the Examiner for an alleged teaching of converting information of a first form received over the external network into information of a second form. However, at no point is there any teaching or suggestion in Akizawa of the above described features of the present invention now more clearly recited in the claims that are not taught or suggested by Martin.

Thus, both Martin and Akizawa suffer from the same deficiencies relative to the features of the present invention as now more clearly recited in the claims. Therefore, combining Martin and Akizawa in the manner suggested by the Examiner in the Office Action would still be deficient of the

features of the present invention as now more clearly recited in the claims. Accordingly, reconsideration and withdrawal of the 35 USC §103(a) rejection of claims 1-19 as being unpatentable over Martin in view of Akizawa is respectfully requested.

The remaining references of record have been studied. Applicants submit that they do not supply any of the deficiencies noted above with respect to the references utilized in the rejection of claims 1-19.

In view of the foregoing amendments and remarks, applicants submit that claims 1-19 are in condition for allowance. Accordingly, early allowance of claims 1-19 is respectfully requested.

To the extent necessary, the applicants petition for an extension of time under 37 CFR 1.136. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, or credit any overpayment of fees, to the deposit account of MATTINGLY, STANGER, MALUR & BRUNDIDGE, P.C., Deposit Account No. 50-1417 (TMI-5010).

Respectfully submitted,

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